

Keith M. Woodwell (#7353)  
Thomas A. Brady (#12454)  
Katherine E. Pepin (#16925)  
**CLYDE SNOW & SESSIONS**  
201 South Main Street, Suite 2200  
Salt Lake City, Utah 84111-2216  
Telephone/Facsimile: (801) 322-2516  
[kmw@clydesnow.com](mailto:kmw@clydesnow.com)  
[tab@clydesnow.com](mailto:tab@clydesnow.com)  
[kep@clydesnow.com](mailto:kep@clydesnow.com)

*Attorneys for Defendants Benjamin F. Daniels,  
Mark W. Schuler, Alton O. Parker, B & B  
Investment Group, LLC, and BW Holdings,  
LLC d/b/a the "FAIR Project"*

---

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION**

---

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING, INC. (d/b/a "DEBT Box"), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a "CORE 1 CRYPTO"), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the "FAIR PROJECT"), a Utah

**DEFENDANTS BENJAMIN F.  
DANIELS, MARK W. SCHULER,  
ALTON O. PARKER, B&B  
INVESTMENT GROUP, LLC, AND BW  
HOLDINGS LLC'S JOINDER IN  
DEFENDANTS IX GLOBAL, LLC,  
JOSEPH A. MARTINEZ, AND TRAVIS  
FLAHERTY'S REPLY TO THE SEC'S  
RESPONSE TO THE COURT'S  
NOVEMBER 30, 2023 ORDER TO  
SHOW CAUSE**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDING, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Defendants Benjamin F. Daniels, Mark W. Schuler, Alton O. Parker, B&B Investment Group, LLC, and BW Holdings, LLC (collectively, the “**FAIR Project Defendants**”) hereby join in Defendants IX Global, LLC, Joseph A. Martinez, and Travis Flaherty’s (the “**iX Global Defendants**”) Reply to the SEC’s Response to the Court’s November 30, 2023 Order to Show Cause<sup>1</sup> and adopts and incorporates all arguments made by the iX Global Defendants therein.

<sup>1</sup> See Doc. 247.

DATED this 12th day of January 2024.

CLYDE SNOW & SESSIONS

/s/ Keith M. Woodwell

Keith M. Woodwell

Thomas A. Brady

Katherine E. Pepin

*Attorneys for Defendants Benjamin F. Daniels,  
Mark W. Schuler, Alton O. Parker, B & B  
Investment Group, LLC, and BW Holdings, LLC  
d/b/a the "FAIR Project"*

**CERTIFICATE OF SERVICE**

I certify that on the 12th day of January 2024, I caused a true and correct copy of the foregoing document to be sent to all attorneys of record via the court's e-filing system.

CLYDE SNOW & SESSIONS

/s/ Kelcie Kinsley